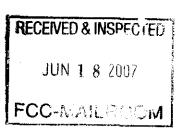


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June 10, 2007

Marlene H. Dortch, Secretary Federal Communications Commission 445 Twelfth St., SW Washington, DC 20554



Re:

High Cost Universal Service Support, WC Docket No. 05-337 Federal-State Joint Board on Universal Service, CC Docket No. 96-45 Comments on May 1, 2007 Recommended decision of Joint Board

Dear Ms. Dortch:

The Ohio Telecom Association (OTA) on behalf of its 42 Incumbent Local Exchange Carrier (ILEC) members, writes in support of the May 1, 2007, Recommended Decision of the Federal-State Joint Board on Universal Service.

The Joint Board's recommendation recognizes the perilous condition of the Universal Service Fund (Fund). Our members, the incumbent eligible telecommunications carriers (ETCs), distributions from the Fund have been flat or declined over the last five years while most of the growth in the fund is attributable to the demands of the competitive eligible telecommunications carriers (CETCs). Consequently, OTA supports the Joint Board's recommended interim emergency cap on the amount of high cost support that CETCs receive in each state based on the average level of CETC support distributed in that state in 2006, as set for in the Recommended Decision.

OTA supports this interim emergency cap as a temporary solution until the Joint Board makes further recommendations on high-cost universal service reform, and asks that the Commission act promptly to adopt the Recommended Decision.

Sincerely

Charles R. Moses

President

CC: Antoinette Stevens, Telecommunications Access Policy Division, Wireline Competition Bureau, 445 12th Street, S.W., Room 5-B540, Washington, D. C. 20554

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